

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Liam Heim

Case No. 18-497

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 29, 2018 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2423(a)

Transportation of Minor to Engage in Criminal Sexual Activity.

18 U.S.C. § 2423(b)

Interstate Travel to Engage in Illicit Sexual Conduct.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

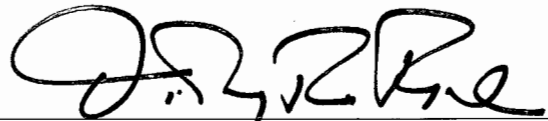
☒ Continued on the attached sheet.*Complainant's signature*

HSI S/A Joshua Conrad

*Printed name and title*

Sworn to before me and signed in my presence.

Date: \_\_\_\_\_

*Judge's signature*City and state: Philadelphia, PA

Hon. Timothy R. Rice, USMJ

*Printed name and title*

Authorized to Sworn  
 Electronically on  
 3/31/18 128 pm

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Date: 3/31/2018Judge Rice (Telephonic Approval e1954)*Judge's signature*City and state: Philadelphia, PA

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Joshua Conrad, a Special Agent (SA) with Homeland Security Investigations (HSI), being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), assigned to the Special Agent in Charge in Philadelphia, PA and I have been so employed since April, 2016. Prior to that, I was assigned to the Special Agent in Charge in El Paso, Texas since October 2010. As part of my daily duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to transportation of a minor in interstate commerce with the intent to engage in sexual activity, and interstate travel with the intent to engage in illicit sexual conduct, in violation of 18 U.S.C. §§ 2423(a) and 2423(b). I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of numerous search warrants, a number of which involved child exploitation and/or child pornography offenses.

2. This affidavit is made in support of a criminal complaint charging Liam HEIM with: 1) transportation of a minor to engage in criminal sexual activity, in violation of 18 U.S.C. § 2423(a); and 2) travel in interstate commerce with intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b).

3. I am familiar with the information contained in this Affidavit based upon the investigation I have conducted, and based on my conversations with other law enforcement

officers who have engaged in numerous investigations involving child exploitation, and with other witnesses.

4. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause in support of the attached criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause.

#### **STATUTORY AUTHORITY**

5. Title 18 U.S.C. § 2423(a) makes it a federal crime for a person to knowingly transport an individual who has not attained the age of 18 years in interstate commerce, or in any commonwealth, territory or possession of the United States, with intent that the individual engage in any sexual activity (defined under federal law to include oral sex – contact between the mouth and penis, or between the mouth and vulva) for which any person can be charged with a criminal offense.

6. Title 18 U.S.C. § 2423(b) makes it a federal crime for anyone to travel in interstate or foreign commerce for the purpose of engaging in any illicit sexual conduct with any person. “Illicit sexual conduct” is defined under this section as any sexual act (defined under federal law to include oral sex – contact between the mouth and penis, or between the mouth and vulva) with a person under the age of 18 years that would be a violation of Chapter 109A if it were to occur in the United States. Among other sexual crimes against minors, Chapter 109A in the United States Code includes violations of 18 U.S.C. § 2243, which makes it a criminal offense to knowingly engage in a sexual act with a minor, that is a person who has not attained the age of 16 years, and who is at least four years younger than the person so engaging.

### **BACKGROUND OF THE INVESTIGATION**

7. On March 31, 2018, I received a call from Sergeant Brian King from the Philadelphia Police Department Special Victims Unit, regarding an individual that had traveled from the State of Florida to meet up with a 12- year old girl he had met on a website entitled Discordapp.com. The individual, Liam HEIM (a 21-year-old male), met the 12-year old girl in Collingswood, New Jersey. HEIM transported the minor into Philadelphia, Pennsylvania via train. HEIM and the minor female then took an Uber to an Extended Stay America hotel near Philadelphia International Airport.

8. The minor victim's parents previously filed a missing child report with the Collingswood Police Department on March 29, 2018. Collingswood Police Department contacted the Camden County Prosecutor's Office on March 30, 2018. The Collingswood Police Department initiated a ping order on the minor child's phone, and the Collingswood Police Department, along with the Camden County Prosecutor's Office, initiated a ping order on HEIM's cellular phone as well. The ping order on HEIM's phone indicated that the phone was located at the Extended Stay America hotel near Philadelphia International Airport. The Camden County Prosecutor's Office, along with the Philadelphia Police Department, and the Collingswood Police Department traveled to the hotel and contacted the hotel staff. Hotel staff directed law enforcement to room 227, where officers encountered HEIM and the minor child. HEIM was taken into custody and the minor was taken for medical examination and a forensic interview.

9. HEIM was interviewed by Camden County Prosecutor's Office, Collingswood, New Jersey Police Department and the Philadelphia Police Department. The interview was

audio recorded. HEIM was read his Miranda rights, waived them in writing, and agreed to speak with police regarding the investigation.

10. HEIM stated that he lives in Gulfport, Florida, and that he met the 12-year old minor on a website called Discordapp.com.

11. HEIM stated that he was the leader/creator of a group on this website and that the 12-year-old victim who had been located with him in the hotel room was one of the members of the group. HEIM stated that he began chatting with the minor approximately one and a half months ago. HEIM stated that he knew it wasn't right to talk to her because of her age. HEIM thought their communications were over, but the minor continued to flirt with him. HEIM stated that he would talk with her everyday via the website group. HEIM stated that they decided to make their relationship official and started dating online. Other Discordapp group members told HEIM that his behavior was inappropriate because of the minor's age and HEIM agreed, but found it difficult to say no to her.

12. HEIM and the minor began texting and video chatting. Some of the conversations became sexual in nature. HEIM stated that the minor sent him provocative photos of her in a bra and one of her in her panties. HEIM stated that he didn't ask for them, but didn't discourage the behavior, because he didn't want to mess things up. (In a subsequent audio/video-recorded interview with HSI agents, HEIM admitted that he found the photos sexually arousing, and that he masturbated to them.) HEIM stated that he did not send any provocative photos of himself.

13. HEIM stated that the minor wanted to meet him, so he agreed to come meet her. HEIM took a flight from Florida to Philadelphia, and then took an Uber to a diner in Collingswood, New Jersey to meet the minor. (In a subsequent audio/video-recorded interview with HSI agents, HEIM admitted that when he traveled from Florida to Philadelphia, he did so with the hope and

intention of engaging in sexual activity with the 12-year-old victim, although not necessarily sexual intercourse.) HEIM and the minor walked to a train station and took a train into Philadelphia, Pennsylvania. HEIM stated that he felt they would end up staying together. HEIM stated that he and the minor went to eat at a restaurant and walked around the city. HEIM stated that he and the minor then took an Uber to a hotel just outside of Philadelphia. HEIM stated that he and the minor were at the hotel for approximately thirty-six (36) hours.

14. HEIM stated that while they were at the hotel they hugged and kissed each other numerous times. HEIM stated that he felt like this was wrong and that he wished he had said no to her requests and her affection. HEIM stated that he might as well try even if it was wrong.

15. HEIM stated that he did not have sexual intercourse with the minor, but they engaged in oral sex. HEIM stated that he put his mouth on her vagina and stimulated her until she felt satisfied. HEIM stated that he performed oral sex on the minor victim two (2) to three (3) times. HEIM stated that he also kissed her stomach, breasts, and neck.

16. HEIM stated that he and the minor were close several times to engaging in vaginal intercourse, but they did not. HEIM stated that he digitally penetrated her vagina approximately two (2) times.

17. HEIM stated that the minor kissed his penis and that she sucked on his penis briefly, but he did not ejaculate.

18. HEIM stated that he traveled with a suitcase containing clothes, a phone, laptop, charger, and a binder, which contained representations of his visions and thoughts.

19. After the minor victim received medical treatment and evaluation, a forensic interview of the victim was conducted. The minor victim acknowledged during the interview that she and HEIM engaged in sexual activity.

20. I obtained screen shots from some of the conversations in the group chat on Discordapp.com that included HEIM and the 12-year old child. In the group chat, HEIM referred to the child's age as 13 years old (instead of her true age of 12 years). He also "publicly" professed his love for her in the group chat, recognizing the fact that she was underage but telling the group to "deal with bitches."

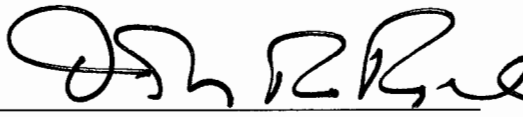
### CONCLUSION

21. Based on the foregoing, I respectfully submit that there is probable cause to believe that Liam HEIM has committed the following federal offenses: 1) transportation of a minor to engage in criminal sexual activity, in violation of 18 U.S.C. § 2423(a); and 2) travel in interstate commerce with intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b). I therefore respectfully request that the Court issue the attached complaint charging HEIM with those offenses, and issue the attached warrant for his arrest.

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Joshua Conrad, Special Agent  
Homeland Security Investigations

Sworn and subscribed  
before me this 31st day of  
March, 2018.

  
HONORABLE TIMOTHY R. RICE  
UNITED STATES MAGISTRATE JUDGE

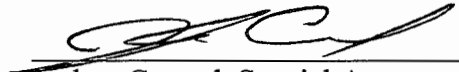
*Authorized & Sworn  
Electronically on  
3/31/18 at 128 p.m*



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Homeland Security Investigations

Sworn and subscribed  
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March, 2018.

Judge Rice (Telephonic Approval @ 1954)  
HONORABLE TIMOTHY R. RICE  
UNITED STATES MAGISTRATE JUDGE